

EXHIBIT B

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re CATHODE RAY TUBE (CRT)) Master Case No.
ANTITRUST LITIGATION) 3:07-cv-05944-SC
) MDL No. 1917
) Individual Case No.
) 3:13-cv-01173-SC;
) 3:13-cv-02776-SC

This Document Relates to:)

ALL ACTIONS)

HIGHLY CONFIDENTIAL

VOLUME 2

Videotaped Deposition of TOSHIHITO
NAKANISHI, taken on behalf of the Defendants,
at 501 West Broadway, 19th Floor, San Diego,
California, commencing at 9:35 a.m., Wednesday,
July 30, 2014, before Cheryl Sletta, CSR No.
7354, RPR.

07:17 1 technical difficulties. How does the video look?

2 Is it okay? Okay.

3 You also testified that you had no reason
4 to believe, in or around 2002, that any of the CRT
07:17 5 suppliers from whom you were purchasing were
6 conspiring; is that correct?

7 MR. HEMLOCK: Objection to form.

8 THE WITNESS: Correct.

9 BY MR. BENSON:

07:18 10 Q Why wouldn't this language in the column
11 associated with 25V tubes have caused you to believe
12 that SDI and LPD might possibly have been conspiring
13 in June of 2002?

14 MR. HEMLOCK: Objection to form.

07:19 15 MS. KOBORI: Objection to form.

16 THE WITNESS: Well, here, it's true, at
17 25V, where you can see "\$83," where it's circled,
18 and the term is "landed in FOB San Diego." So that
19 means that in fact, in reality, it would be a
07:20 20 different price.

21 As I said this morning, if it was FOB San
22 Diego, there will be a cost associated with bringing
23 from San Diego to Mexico. So my understanding is
24 that the actual cost would be different. I believe
07:20 25 that would have been my understanding. And so I

07:20 1 believe that it was -- it was the Japan side that --
2 who used the term "conspiracy."

3 DEFENDANTS' CHECK INTERPRETER: Bid
4 rigging.

07:21 5 THE INTERPRETER: Huh?

6 DEFENDANTS' CHECK INTERPRETER: Bid
7 rigging.

8 THE INTERPRETER: Yeah, price. Price --

9 DEFENDANTS' CHECK INTERPRETER: Fixing.

07:21 10 THE INTERPRETER: -- rigging or fixing.

11 THE WITNESS: But such term was used, but
12 people in Japan do not know the situation with the
13 border, for example. They have no knowledge
14 regarding how things go back and forth between San
07:21 15 Diego and Mexico. So just because the price just
16 happened to be \$83, the same \$83, they came up with
17 this comment. I think that's what I think.

18 BY MR. BENSON:

19 Q Was there anything that happened following
07:22 20 your review of this document -- well, let me ask
21 another question.

22 Was there anything that happened in or
23 after June of 2002 that caused you to believe that
24 Samsung or LGPD were conspiring?

07:22 25 MS. KOBORI: Objection. Vague.

07:22 1 THE WITNESS: No, nothing in particular.

2 BY MR. BENSON:

3 Q After you received this document, did you
4 continue to negotiate with both Samsung and LGPD for
07:22 5 purchases of CPT tubes?

6 A Yes, I did.

7 Q And did anything about their conduct in
8 those negotiations cause you to believe that they
9 may have been conspiring?

07:23 10 A No, nothing in particular.

11 Q And did anything about the results of
12 those negotiations cause you to believe that they
13 may have been conspiring?

14 A No, nothing in particular.

07:23 15 Q I'd like to ask you a little bit about the
16 role --

17 MR. HEMLOCK: Sorry, I had an objection in
18 there. Forgive me if I didn't say it loud enough,
19 but I objected to his last question.

07:24 20 Just: Objection. Form, please. Thank
21 you.

22 BY MR. BENSON:

23 Q I'd like to ask you a little bit about --
24 well, let me -- you commented earlier in response to
07:24 25 certain questions that one of the pieces of